

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

KC FILED

MAY 10 2007

JG
MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

Sharon Baker
344 Sauk Trail
Park Forest, IL 60466
Plaintiff,

v.

American Coradius International, LLC
c/o CT Corp. Systems, Registered Agent
208 SO Lasalle Street, Suite 814
Chicago, IL 60604
Defendant.

CASE NO.:

07CV2640
JUDGE CONLON
MAGISTRATE JUDGE DENLOW

COMPLAINT FOR DAMAGES
UNDER THE FAIR DEBT
COLLECTION PRACTICES ACT
AND OTHER EQUITABLE RELIEF

JURY DEMAND ENDORSED HEREIN

JURISDICTION AND VENUE

1. Jurisdiction is founded on 28 U.S.C. §1331 pursuant to the Fair Debt Collections Practices Act (FDCPA), 15 U.S.C. §1692. Venue is proper in this district because this is the judicial district where all of the events giving rise to the cause of action took place.

FACTS COMMON TO ALL COUNTS

2. The Plaintiff is a person who incurred a consumer debt primarily for personal, family or household purposes.
3. Defendant is a corporation doing business primarily as a consumer debt collector.
4. Defendant is a debt collector as defined by the FDCPA, 15 U.S.C. §1692a(6).
5. The Plaintiff is a consumer as defined by 15 U.S.C. §1692a(3).
6. The debt in question qualifies as a debt as defined by 15 U.S.C. §1692a(5).

7. Defendant is either the holder of the debt or was retained by the current holder to collect the debt.
8. All of Defendant's actions occurred within one year of the date of this Complaint.
9. Plaintiff retained Legal Helpers, P.C. to file a bankruptcy.
10. Defendant contacted Plaintiff on February 23, 2007. Plaintiff informed Defendant that she was represented by an attorney, provided her attorney's information, website address, and phone number.
11. On February 28, 2007, Defendant contacted Plaintiff at home.
12. On March 5, 2007, Defendant contacted Plaintiff at home.
13. On March 12, 2007, Defendant contacted Plaintiff at home.
14. On March 21, 2007, Defendant contacted Plaintiff at home.
15. During every conversation, Plaintiff advised Defendant of its attorney representation.
16. Defendant Violated the FDCPA.

COUNT ONE

Violation of the Fair Debt Collections Practices Act

17. Plaintiff incorporates each of the preceding allegations as if specifically stated herein.
18. The Defendant violated 15 U.S.C. §1692c in that it continued, on multiple occasions, to contact Plaintiff notwithstanding the fact that the defendant was told by the Plaintiff they were represented by an attorney.

COUNT TWO

Violation of the Fair Debt Collections Practices Act

19. Plaintiff incorporates each of the preceding allegations as if specifically stated herein.
20. The Defendant violated 15 U.S.C. §1692e in that their actions were unfair and/or unconscionable means to collect a debt.

JURY DEMAND

21. Plaintiff demands a trial by jury.

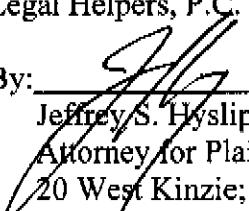
PRAYER FOR RELIEF

22. Plaintiff prays for the following relief:

- a. Judgment against defendant for statutory damages pursuant to 15 U.S.C. §1692k and costs, and reasonable attorney's fees pursuant to 15 U.S.C. §1692k.
- b. For such other legal and/or equitable relief as the Court deems appropriate.

RESPECTFULLY SUBMITTED,

Legal Helpers, P.C.

By: 

Jeffrey S. Hyslip

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